

UNITED STATE DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

FILED  
IN CLERKS OFFICE  
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U.S. DISTRICT COURT  
DISTRICT OF MASS.

Albert William Bleau Jr.

Plaintiff

Vs.

Civil Action  
No. 04 – 10469WGY

Bridgewell, Inc. (Greater Lynn Mental Health  
& Retardation Association), et al,

Defendants

**Motion To Delay Trial for Ninety Days To Allow Additional Time  
For Discovery**

The Plaintiff respectfully requests that this honorable court delay trial for ninety days to allow additional time for discovery.

The plaintiff relies on his November 29, 2006 motion for reconsideration with its accompanying attachments as well as plaintiff's motion of May 30, 2006 and its accompanying arguments and facts.

1. Additionally, the plaintiff has planned a vacation to his wife's homeland in Europe during the upcoming holidays from December 19, 2006 to January 5, 2007. Plaintiff's wife has not been home for the holidays for over ten years and this trip has been planned for over a year and the tickets have been purchased. See attached itinerary.

2. The plaintiff will have limited opportunity to conduct discovery during the

next sixty days due to demands from his work to perform extra hours of consultation and reports to compensate for the vacation time off.

3. The plaintiff is a pro se plaintiff and the discovery process is complicated and unknown to the plaintiff and the plaintiff has received limited cooperation from the defendants. Federal Rules for written questions allow the defendant fourteen days to respond and the plaintiff an additional seven days to respond and this does not include expected court challenges from the defendant.

4. The Attorney General has sixty days to respond to the subpoena and the plaintiff expects various challenges from his office.

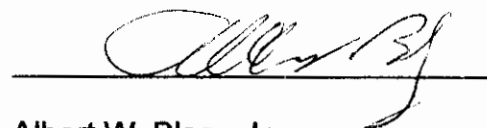
5. Three of the individuals critical to the plaintiff's claim for Defamation reside in Northern Maine and one resides in New Hampshire.

6. The plaintiff has no resources to pay for discovery and needs to rely on earned income as the discovery process goes forward to pay for the costs of depositions. The plaintiff has no knowledge of the written question and deposition process or how to serve a federal subpoena in Maine.

For the fore mentioned facts and arguments the plaintiff respectfully requests that this motion be granted.

Dated: November 29, 2006

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Albert W. Bleau Jr.', is written over a horizontal line.

Albert W. Bleau Jr.  
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**CERTIFICATE OF SERVICE**

I hereby certify that a true copy of the above document was served upon all counsel of record by First Class Mail on November 30, 2006.

  
Albert W. Bleau Jr.

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